



To [REDACTED]
[REDACTED]
From [REDACTED] – Named Information and Compliance Support Officer
Date 31/08/17
Time 14.00
Venue [REDACTED]
Subject Unauthorised Anaesthesia for Mouse Ear Lesion Measurement
Pages 2
Our Ref [REDACTED]

Policy-

Compliance Assurance Meetings (CAMs) are a management tool, designed to ensure Governance outside of the Act, to protect individuals, ensure due process and systems are implemented within the division of University Biomedical Services. This process will ensure the University upholds the highest standards of animal welfare and good practice relating to animal care and use.

NOTE: A CAM meeting does not replace the investigation of an incident by the Home Office or other authority. Therefore for example, where the local inspector deems appropriate a Home Office non-compliance investigation may run in parallel or sequentially with a CAM.

Event-

On Friday 11 August 2017 [REDACTED] (PIL - [REDACTED] spoke to [REDACTED] (Senior Technician) to enquire if the anaesthetic circuit in the Category 2 area of the [REDACTED] Biofacility would be operational over the weekend as there were planned power outages. [REDACTED] confirmed to [REDACTED] that she proposed to use anaesthesia to undertake measurements of mouse ear lesions previously undertaken on the [REDACTED] PPL ([REDACTED] – Poxvirus virulence and Immunogenicity) Protocol 1, under Study Plan [REDACTED]. [REDACTED] checked the PPL and verbally advised [REDACTED] that there was not clear authority to anaesthetise the mice to undertake measurements. [REDACTED] contacted [REDACTED] (Deputy Director) by telephone to make him aware and followed up in writing to [REDACTED] to request information on previous measurements undertaken using anaesthesia.

[REDACTED] confirmed by email reply late on Monday 14 August:

"I have discontinued of using anaesthesia for lesion measurement since last Friday, as requested."

Subsequently [REDACTED] provided clarification by email on Tuesday 15 August that she had previously undertaken anaesthesia for lesion measurement as follows:

"Here is the correct information: Lesion measurements for cages # C00095986 and C00095987 were performed on 8/08 and 10/08. Lesion measurements for cages # C00095992, C00095994, C00095995 were performed on 29/07, 31/07, 2/08, 4/08, 6/08, 8/08 and 10/08. My apologies for the confusion. There are 5 animals per cage."

This equates to 125 unauthorised regulated procedures.



The Home Office inspector, [REDACTED] was notified, by email from [REDACTED] on Tuesday 15 August.

A Compliance Assurance Meeting has been selected as the most appropriate means of action to ensure governance and compliance and, setting processes in place to impress there is no repetition of this event.

Action-

[REDACTED] would like to thank all for attending the CAM regarding the unauthorised use of general anaesthesia as a method of restraint for lesion measuring. As happens occasionally this CAM was held after the incident had been investigated by the local Home Office Inspector, [REDACTED]. The CAM committee were pleased to hear that [REDACTED] and [REDACTED] found the communication with the inspector helpful and are already acting upon the received advice moving forward.

In discerning why these events had taken place, [REDACTED] enquired into the history of the group's licences. It was revealed that in a previous project licence permission had already been granted for the use of anaesthesia for restraint for the purpose of accurately measuring these small lesions (up to 6mm in diameter) which in a conscious, moving mouse is fraught with error. The team were therefore very experienced and familiar with this technique. During the writing of their current licence, there was a change in HOI and a change in project licence writing style that resulted in a very lengthy time-course of writing, and the detail of lesion measuring being classified as AA with the AB being missed (see Glossary of Terms below). On enquiries into why the study plan had not picked up the licence inconsistency it was explained that the level of detail of *how* the measurement was to be made was not included.

The committee, and the HOI, could see that there was a genuine misunderstanding, and that "there were no significant adverse welfare impacts arising from the use of unauthorised restraint anaesthesia" and that "you believed that it would be more welfare friendly and less stressful for the mice if they were subject to brief restraint anaesthesia", and so the committee is in full support of the research team submitting an amendment as per the HOI's detailed advice (quotes taken from the HOI's communications). The NVS team indicated that from your previous experiences the repeated anaesthesia this does not cause any cumulative harm to the animals.

As an aside, [REDACTED] suggested that they take the opportunity of the amendment to make any additional requested changes to the PPL – namely antibiotic use, blood withdrawal permissions by venous and intracardiac routes – whilst this was mentioned at the CAM the full ethical considerations will be given by the AWERB.

In summary, the further actions advised by the CAM are:

- [REDACTED] should submit a PPL amendment in accordance with the HOI's advice – completed.
- [REDACTED] and the PILhs should review the Standard Conditions of personal and project licences, in particular SC 19 of the PIL concerning authorities for regulated procedures.



- [REDACTED] group should make full use of the UBS Biofacility team to help and guide on current management, husbandry and handling techniques in order to provide reassurance, improve confidence and further refine procedures.
- [REDACTED] (NACWO) will disseminate such advice and guidance amongst other Biofacility users.

CC: [REDACTED] Home Office Inspector

Glossary of terms

AA	A procedure performed without anaesthesia
AB	A procedure performed under anaesthesia, from which the animal recovers
AWERB	Animal Welfare and Ethical Review Body
CAM	Compliance Assurance Meeting
HOI	Home Office Inspector
NVS	Named Veterinary Surgeon
NACWO	Named Animal Care and Welfare Officer
PIL	Personal Licence (Procedures Individual Licence)
PILh	Personal Licence (Procedures Individual Licence) holder
PPL	Project Licence (Procedures Project Licence)
SC	Standard Conditions (of either PIL or PPL)
UBS	University Biomedical Services